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Attorneys for Purple Innovation, LLC

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

**PURPLE INNOVATION, LLC, A
Delaware limited liability company,**

Plaintiff,

v.

**HONEST REVIEWS, LLC, a Florida
Corporation, RYAN MONAHAN, an
individual, and GHOSTBED, a
Delaware corporation,**

Defendants.

***EX PARTE MOTION TO FILE UNDER
SEAL – OPPOSITION TO DEFENDANT
GHOSTBED, INC.’S MOTION TO
DISMISS THE FIRST AMENDED
COMPLAINT***

Case No.: 2:17-cv-00138-DB

Honorable Dee Benson

Pursuant to DUCivR 5-2, Plaintiff Purple Innovation, LLC (“Plaintiff” or “Purple”), by and through its counsel of record MAGLEBY CATAKINOS & GREENWOOD, hereby moves the Court for leave to file under seal its Opposition to Defendant GhostBed, Inc.’s Motion to Dismiss the First Amended Complaint (the “Opposition”).

DUCivR 5-2(a) provides that “[o]n motion of a party and a showing of good cause, a judge may order a . . . document filed in a civil case to be sealed.” In this

matter, good cause exists to seal Plaintiff's Opposition. The Opposition and its exhibits contain information that is highly confidential, including many documents that GhostBed has designated CONFIDENTIAL INFORMATION – ATTORNEYS EYES ONLY, under the Standard Protective Order. To honor GhostBed's designations, and to maintain the confidentiality of such documents, the Opposition should be filed under seal.

A proposed order is attached and emailed to chambers.

Pursuant to DUCivR 5-2(e)(3), counsel certifies that the Opposition and the exhibits are entitled to protection under the terms of the Standard Protective Order. Counsel further certifies that the Opposition contains such an abundance of confidential information that filing a redacted version would not be meaningful.

DATED this 8th day of May, 2017.

MAGLEBY CATAKINOS & GREENWOOD



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CERTIFICATE OF SERVICE

I hereby certify that I am employed by the law firm of MAGLEBY CATAKINOS & GREENWOOD, 170 South Main Street, Suite 1100, Salt Lake City, Utah 84101, and that, pursuant to Rule 5 of the Federal Rules of Civil Procedure, I served a true and correct copy of the foregoing **EX PARTE MOTION TO FILE UNDER SEAL – OPPOSITION TO DEFENDANT GHOSTBED, INC.’S MOTION TO DISMISS THE FIRST AMENDED COMPLAINT** upon the following via ECF and/or electronic mail this 8th day of May, 2017:

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